

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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YEHUDA SIGALIT,

Plaintiff,

- against -

JOSSEF KAHLON,

Defendant.

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Case No. 21-cv-08921 (MMG)(JC)

**DECLARATION OF
MINYAO WANG**

MINYAO WANG, an attorney duly admitted to practice before this Court, declares as follows under the penalty of perjury:

1. I am a partner of the law firm of Lewis Brisbois Bisgaard & Smith LLP (“Lewis Brisbois”), counsel for Defendant Jossef Kahlon. I submit this declaration in support of the instant motion of Lewis Brisbois and myself to withdraw as counsel of record for Mr. Kahlon.

2. Lewis Brisbois entered an appearance on behalf of Mr. Kahlon in April 2024. David Haft, then a partner at Lewis Brisbois’s Fort Lauderdale office, was the relationship partner for this engagement. I have served as local counsel.

3. Lewis Brisbois seeks to withdraw as counsel for Mr. Kahlon primarily due to the resignation of Mr. Haft from Lewis Brisbois effective February 10, 2025. Mr. Haft thereafter joined DarrowEverett LLP as a partner. Mr. Haft continues to represent Mr. Kahlon from his new law firm, DarrowEverett LLP. For example, I understand, based on a review of the docket and based on communications from Mr. Haft, that Mr. Haft appeared in person on behalf of Mr. Kahlon on February 25, 2025. I also understand from Mr. Haft that since February 10, Mr. Haft has been communicating on behalf of Mr. Kahlon with opposing counsel on this matter and with the Court in his capacity as Mr. Kahlon’s counsel.

4. I further understand that on February 25, 2025, the Court entered an order that, among other things, directed Mr. Haft to “update his ECF account so that his address, firm affiliation, and other contact information is accurate on the docket.” *See* ECF No. 121 at 2. This confirms that Mr. Haft has been, since his departure from Lewis Brisbois, acting as the responsible attorney for Mr. Kahlon in this matter as he had been prior to his departure from Lewis Brisbois.

5. Since Mr. Haft’s departure from Lewis Brisbois on February 10, 2025, Lewis Brisbois has performed no substantive work on this matter other than what was necessary to effectuate a smooth transition to DarrowEverett LLP.

6. Lewis Brisbois does not have an ongoing relationship with Mr. Kahlon.

7. I understand that Lewis Brisbois has asked Mr. Haft and DarrowEverett LLP to execute a substitution of counsel stipulation. To date, they have not acted on this request.

8. I advised Mr. Haft and Mr. Kahlon by email on March 7, 2025, of our intent to file this application to withdraw. Mr. Kahlon responded that he consents to this application.

9. Counsel for Plaintiff, Steven Haffner, advised me by phone on March 7, 2025, that he consents to this application.

10. Because Mr. Haft has been acting as counsel to Mr. Kahlon without interruption since his departure from Lewis Brisbois, there should be no prejudice to Mr. Kahlon and, since no delay is entailed for the substitution of counsel, there will not be any prejudice to any party from our proposed withdrawal.

11. In accordance with Local Civil Rule 1.4, we are serving this motion upon Mr. Kahlon at his current home address via FedEx, and by email, and upon all parties hereto by ECF.

12. For the foregoing reasons, it is respectfully requested that Lewis Brisbois and I be permitted to withdraw as counsel to Mr. Kahlon.

Dated: New York, New York
March 7, 2025

/s/ Minyao Wang
Minyao Wang